

REMARKS

In response to the Office Action dated July 29, 2005, Applicant respectfully requests reconsideration and withdrawal of the rejection of the claims.

Claims 1-12 were rejected under 35 U.S.C. § 103, on the grounds that they were considered to be unpatentable over the newly-cited User's Guide for Symantec pcAnywhere, identified in the Office Action as "Symantec", in view of the previously-cited Antur et al patent (US 6,212,558). For the reasons presented below, as well as in Applicant's previous response, it is respectfully submitted that these references do not suggest the claimed subject matter to a person of ordinary skill in the art, whether considered individually or in combination.

With reference to claim 1, the Office Action states that the Symantec User's Guide discloses a software tool for use in configuring firewalls, which communicates with a database to obtain the identification of firewall devices associated with a network, and generate a first image on a display which lists those devices. The Office Action makes specific reference to the Symantec User's Guide at page 10, chapter 3, and pages 41 and 48 of chapter 4. It is respectfully submitted that these portions of the reference do not support the statement set forth in the Office Action.

More generally, the Symantec User's Guide does not appear to have any bearing on the subject matter of the present application. Claim 1 recites a software tool "for use in configuring firewalls". Similarly, claim 6 recites a method "for configuring firewalls". The Symantec pcAnywhere product does not relate to the configuration of firewalls. Rather, its function is to enable users to access a computer from a remote site, to control that computer and/or transfer files between two computers. See, for example, the description of the product in the introductory

passage on page 9, as well as the "Overview of remote control" appearing on page 13. None of the passages cited in the Office Action refer to the configuration of firewalls. Moreover, an online search of the User's Guide indicates that the word "firewall" does not appear anywhere in the document.

Accordingly, it is respectfully submitted that the Symantec User's Guide does not disclose an interface that obtains the identification of firewall devices associated with a network and generates a first image on a display which lists those devices, as recited in claim 1. Nor does it disclose the steps of communicating with a database "to obtain the identification of firewall devices associated with a network", and generating a first display which lists those devices, as recited in claim 6.

The Office Action acknowledges that the Symantec User's Guide does not disclose the second element recited in claim 1, namely a means which is responsive to the selection of one of the firewall devices displayed in a list to generate a second image which lists conduits within the selected device, where each conduit is identified by descriptive names for the local and external devices and/or networks that are logically connected by the conduit. To this end, therefore, the Office Action refers to the Antur patent, and its disclosure of a system for managing firewall servers from a central administration point. The Office Action asserts that it would be obvious to employ the Symantec pcAnywhere product to remotely control a directory server to configure or reconfigure a firewall. It is respectfully submitted that, even if such a combination of the disclosures of the references is implemented, the result does not lead one of ordinary skill in the art to the presently claimed subject matter.

As pointed out in Applicant's previous response, the Antur patent does not disclose a firewall configuration tool which is responsive to the selection of one firewall device in a list to generate a new image which list conduits within the selected device by the descriptive names for the local and external devices connected by the conduit. See the paragraph bridging pages 6 and 7 of the previous response. The most recent Office Action does not address this issue. Rather, it only refers to the Antur patent in a very general sense, namely its disclosure of the ability to modify the configuration of multiple firewalls from a central point. This discussion does not address the *claimed* subject matter. Applicant is not claiming the ability to configure a firewall from a remote location, *per se*. Rather, the claims are directed to a *specific* tool, and its associated method, for the configuration of a firewall. The Office Action does not provide any correlation between the particular features recited in the claims and the disclosure of the Antur patent. It only refers to Figures 7-24, collectively, of the patent. It does not identify which one of these figures is considered to constitute the claimed second image, or second display, that is generated in response to the selection of a firewall device listed in a first image, or a first display.

For at least these reasons, therefore, it is respectfully submitted that the Office Action fails to show that Symantec User's Guide and the Antur patent suggest the claimed subject matter to a person of ordinary skill in the art. The Symantec product does not pertain to the configuration of firewalls. Furthermore, even if this product is used to remotely control a server on which a firewall can be configured, there is no disclosure in either reference of the generation of the first and second displays as recited in claims 1 and 6.

Additional distinguishing features of the invention are set forth in the various dependent claims. In view of the fundamental differences identified above, a detailed discussion of these additional distinctions is believed to be unnecessary at this time. Reconsideration and withdrawal of the rejection, and allowance of all pending claims is respectfully submitted.

Respectfully submitted,

BUCHANAN INGERSOLL, PC

Date: January 30, 2006
By: 
James A. LaBarre
Registration No. 28,632

P.O. Box 1404
Alexandria, Virginia 22313-1404
(703) 836-6620